UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

19 Civ. 09439 (PKC)

Plaintiff,

ECF Case

- against -

TELEGRAM GROUP INC. and TON ISSUER INC.

Defendants.

NON-PARTY INVESTOR I'S REPLY IN SUPPORT OF ITS MOTION TO SEAL

Non-Party Investor I's February 4, 2020 motion to seal (ECF No. 143) showed that the Court should permanently seal Investor I's name and other identifying information, which the U.S. Securities and Exchange Commission ("SEC") tentatively filed in redacted form in Exhibit R to the October 11, 2019 declaration of Daphna Waxman (ECF No. 16) and Exhibit PX152 to the January 21, 2020 Declaration of Ladan Stewart (ECF No. 97).

In its February 13, 2020 omnibus response (ECF No. 190), the SEC stated it does not dispute any portion of Investor I's motion. Thus, pursuant to *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 113 (2d Cir. 2006), the Court should permanently seal Investor I's name and other identifying information in Exhibit R, Exhibit PX152, and any other filings where they may appear without the knowledge of Investor I. In particular, the Court should seal the names of Investor I, Investor I's manager, Investor I's investment advisor, the names of that advisor's employees, and the initials of the beneficiary to the trust owning Investor I (identified in PX152).

Dated: February 24, 2020 Respectfully submitted,

s/ Andrew Escobar

Andrew Escobar 701 Fifth Avenue, Suite 6900 Seattle, Washington 98104 Tel: 206.839.4800

206.839.4801 Fax:

E-mail: andrew.escobar@us.dlapiper.com

Attorney for Non-Party Investor I